

**UNITED STATES COURT OF APPEALS
FOR THE SEVENTH CIRCUIT**

Contemporary Cars, Inc., <i>et al.</i> ,)	
)	
Petitioners/Cross Respondents,)	
)	
v.)	
)	
National Labor Relations Board,)	
)	
Respondent/Cross Petitioner,)	Nos. 14-3723
)	15-1187
and)	
)	
International Association of Machinists)	
and Aerospace Workers,)	
)	
Intervenor – Intervening)	
Respondent.)	
_____)	

**PETITIONERS/CROSS-RESPONDENTS’ ANSWER TO
CROSS-APPLICATION FOR ENFORCEMENT**

Pursuant to Rule 15(b)(2) of the Federal Rules of Appellate Procedure, Petitioners Contemporary Cars, Inc., d/b/a Mercedes-Benz of Orlando and AutoNation, Inc., (“Petitioners”), hereby answer Respondent/Cross-Petitioner National Labor Relations Board’s (“Respondent”) Cross-Application for Enforcement as follows:

1. Petitioners deny that they committed any of the unlawful conduct found in Respondent’s Order in Case Nos. 12-CA-026126, 12-CA-026233, 12-CA-

026306, 12-CA-026354, 12-CA-026386, and 12-CA-026552, reported at 361 NLRB No. 143 (“Order”).

2. Petitioners deny that they should be required to undertake any affirmative action as set forth in the Order.

3. Petitioners admit that this Court has jurisdiction over Respondent’s Cross-Application for Enforcement pursuant to 29 U.S.C. § 160(e).

4. Petitioners admit that venue is proper in this Circuit, and that AutoNation, Inc. does business in this Circuit. Further answering, Petitioners admit that, with respect to the events at issue in this consolidated appeal, they constitute a single employer. Petitioners’ admission as to single employer status is not intended to apply to, or otherwise bind AutoNation, Inc., in any other pending and future Board proceedings involving either Mercedes Benz of Orlando or AutoNation, Inc. or both, and Petitioners reserve the right to contest such determination in any other such proceedings.

WHEREFORE, having fully answered Respondent’s Cross-Application for Enforcement, Petitioners respectfully request that the Cross-Application for Enforcement be dismissed with prejudice and that Petitioners be awarded costs and other such relief as this Court deems just and proper.

Respectfully submitted,

s/ Steven M. Bernstein

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CERTIFICATE OF SERVICE

I hereby certify that on February 23, 2015, I served a copy of the foregoing **Petitioners/Cross-Respondents' Answer To Cross-Application For nforcement** on the following attorneys by ECF notification:

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